

# ROWELL CAPITAL PARTNERS

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FILE

T.H. Rowell, Jr.  
William K. Rowell  
Joseph C. Rowell

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

RECEIVED

SEP 10 1991

Federal Communications Commission  
Office of the Secretary

In the Matter of )  
 )  
Amendment of Part 74 of )  
the Commission's Rules )  
and Regulations with )  
Regard to the Low Power )  
Television Service )

RM-7772

To: The Commission

## COMMENTS OF WILLIAM K. ROWELL

1. William K. Rowell hereby submits these comments supporting the above-captioned Petition for Rule Making filed by the Community Broadcasters Association (CBA).

2. I became the permittee of LPTV Station W21AU, Orlando Florida, on March 8, 1991. I spent almost two years searching for an LPTV station in the Orlando area and am very much looking forward to building and operating my station to provide family-oriented programming to the community where I live and work.

3. The station I am building will provide city grade coverage to all of Orlando and will rely very little (I anticipate less than 20%) on satellite-fed programming. I plan to produce a substantial amount of local programming and would like to see my station treated like any other television station that provides a similar programming service.

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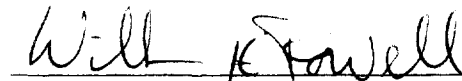
4. The problem of LPTV's peculiar call signs is of special concern to me. As I have talked to people in the community about my station, I have found that they do not recognize call signs with numbers and do not understand what those call signs represent. Even if they see an LPTV station's programming listed in a newspaper or television magazine, they are not sure how the station can be tuned in or whether they can view it on their television sets or need some special equipment. Because of this, the unfamiliar call sign seems to create a confusion among the general public. This confusion and unfamiliarity extends to potential advertisers, working to dissuade them from purchasing airtime. LPTV stations face enough problems relating to their limited coverage areas without having to educate people to recognize their call signs as representing the same kind of television signal that comes from every other TV broadcast station. It is very important that the Commission address this problem soon and allow on the air LPTV stations to have four-letter call signs.

5. I also see no reason why my station and others should not be able to use a transmitter with more than one kilowatt output power if we do not cause interference to any other station. The current practice of using extremely high gain antennas to achieve coverage is not the optimum way to provide television service or construct a television station. High gain antennas are usually very large and heavy with high wind loading; this makes them undesirable for tower operators to allow placement of these antennas on many towers because of the great stress they create. This increased weight and stress along with the

immense physical size, reduces the number of tenants which can be placed on a tower resulting in very high rent charged to the television station. This increase in rent can be as much as 300% or more of the normal monthly rate. A higher powered transmitter with a lower gain antenna would have no more impact on spectrum availability than today's system, but the public would enjoy more reliable service.

6. In sum, I strongly urge the Commission to respond favorably to the CBA's petition. This petition asks for some very simple forms of recognition for those LPTV stations that are willing to give something important to their community in return. Those stations that extend themselves by providing local programming services should be allowed to enjoy benefits that can be made available without changing the basic spectrum allocation scheme that governs the LPTV service.

Respectfully submitted,



William K. Rowell

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September 6, 1991

CERTIFICATE OF SERVICE

I, William K. Rowell, do hereby certify that I have, this 6 day of September, 1991, caused to be sent by first class United States mail, postage prepaid, a copy of the foregoing "Comments of William K. Rowell" to:

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William K. Rowell